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8 **BEFORE THE**
9 **BOARD OF REGISTERED NURSING**
10 **DEPARTMENT OF CONSUMER AFFAIRS**
11 **STATE OF CALIFORNIA**

12 In the Matter of the Accusation Against:

Case Number *2013-860*

13 **MEGAN ANN SANDIFER HARRISON**
a.k.a. **MEGAN ANN HARRISON-VANBEEST**
14 a.k.a. **MEGAN ANN SANDIFER HARRISON-VANBEEST**
211 North Walnut Street, Apartment 1
Bay City, Michigan 48706

A C C U S A T I O N

15 **Registered Nurse License Number 753903**

16 Respondent.

17
18 Complainant Louise R. Bailey, M.Ed., R.N., alleges:

19 **PARTIES**

20 1. Complainant brings this Accusation solely in her official capacity as the Executive
21 Officer of the California Board of Registered Nursing (California Board), Department of
22 Consumer Affairs.

23 2. On or about July 6, 2009, the Board issued Registered Nurse License Number 753903
24 to respondent Megan Ann Sandifer Harrison, a.k.a. Megan Ann Harrison-Vanbeest, a.k.a. Megan
25 Ann Sandifer Harrison-Vanbeest. This registered nurse license expired on June 30, 2011, and has
26 not been renewed.

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5. On or about December 28, 2009, the Texas Board of Nursing (Texas Board) issued Texas Registered Nurse License Number 778581 to respondent. Texas Registered Nurse License Number 778581 expired on May 31, 2011, and has not been renewed.

7. Section 118, subdivision (b), provides, in part, that the expiration of a license shall not deprive the California Board of jurisdiction to proceed with a disciplinary action during the period within which the license may be renewed, restored, reissued or reinstated.

9. Section 2764 provides, in part, that the expiration of a license shall not deprive the California Board of jurisdiction to proceed with a disciplinary proceeding against the licensee or to render a decision imposing discipline on the license. Under section 2811, subdivision (b), the California Board may renew an expired license at any time within eight years after the expiration. After the expiration of such eight-year period the California Board may require as a condition of

Accusation	
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1 reinstatement that the applicant pass such examination as it deems necessary to determine her
2 present fitness to resume the practice of professional nursing.

3 10. California Code of Regulations, title 16, section 1419.3, provides that a licensee may
4 renew a license that has been expired for more than eight years by paying the renewal and penalty
5 fees specified in Section 1417 and providing evidence that he or she holds a current valid active
6 and clear registered nurse license in another state, a United States territory, or Canada, or by
7 passing the California Board's current examination for licensure.

8 **STATUTORY PROVISIONS**

9 11. Section 2761 states, in pertinent part:

10 "The [California] board may take disciplinary action against a certified or licensed nurse or
11 deny an application for a certificate or license for any of the following:

12 "(a) Unprofessional conduct, which includes, but is not limited to, the following:

13 ...

14 "(4) Denial of licensure, revocation, suspension, restriction, or any other disciplinary action
15 against a health care professional license or certificate by another state or territory of the United
16 States, by any other government agency, or by another California health care professional
17 licensing board. A certified copy of the decision or judgment shall be conclusive evidence of that
18 action."

19 **COST RECOVERY**

20 12. Section 125.3 provides, in pertinent part, that the California Board may request the
21 administrative law judge to direct a licentiate found to have committed a violation or violations of
22 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and
23 enforcement of the case, with failure of the licentiate to comply subjecting the license to not being
24 renewed or reinstated. If a case settles, recovery of investigation and enforcement costs may be
25 included in a stipulated settlement.

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1 . . . issued a Consent Order, which reprimanded Respondent, ordered Respondent
2 to pay fines and costs totaling \$700.00, and provided stipulations that Respondent
3 must satisfy prior to Respondent's request for reinstatement of her nursing license
4 in Louisiana. The disciplinary action was based on Respondent's failure to
disclose her October 4, 2005 misdemeanor conviction on her applications for
licensure in Louisiana and Texas. . . .

5 "7. Respondent failed to notify [the Michigan Board] of the final adverse
6 administrative action taken by the Louisiana Board within 30 days of the
disciplinary action."

7 **SECOND CAUSE FOR DISCIPLINARY ACTION**
8 **Bus. & Prof. Code, §2761(a)**
9 **General Unprofessional Conduct**

10 15. Complainant realleges the allegations set forth in paragraphs 13-14 above and
incorporates them by reference as if fully set forth.

11 16. The conduct as alleged in paragraphs 13-14 above constitutes general unprofessional
12 conduct and provides grounds for discipline of respondent's California registered nurse license
13 under the non-inclusive provisions of section 2761, subdivision (a).

14 **THIRD CAUSE FOR DISCIPLINARY ACTION**
15 **Bus. & Prof. Code, § 2761, subd. (a)(4)**
16 **Unprofessional Conduct – Out of State Discipline**

17 17. The allegations of paragraphs of 13-14 above are realleged and incorporated by
reference as if fully set forth.

18 18. Respondent has subjected her California registered nurse license to disciplinary action
19 under section 2761, subdivision (a)(4), in that on or about May 14, 2011, in a disciplinary action
20 before the Louisiana Board in Case Number RN124589, the Louisiana Board issued a Consent
21 Decree formally reprimanding respondent's Louisiana Registered Nurse License Number 124589.
22 The Consent Order stated that within six months of its effective date, respondent shall submit a
23 payment of \$200 to the Board as cost of the Consent Order and submit a payment of \$500 to the
24 Board as a fine. The Consent Order also contained stipulations that must be completed prior to
25 eligibility to request reinstatement of respondent's Louisiana registered nurse license.

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1 19. The Stipulations included, but were not limited to, the following:

2 a. Respondent must submit to a comprehensive outpatient psychiatric, psychological,
3 and substance abuse evaluation at respondent's expense at a Louisiana Board-recognized
4 evaluation and treatment center.

5 b. If respondent is found to be chemically dependent, she must immediately sign an
6 agreement with the Recovering Nurse Program (RNP) and submit evidence of compliance with
7 all program requirements for at least three years. The stay of respondent's license suspension and
8 probation will be extended to run concurrently with RNP participation.

9 c. Respondent must not have any misconduct criminal violations or convictions or
10 health care regulations violations reported to the Louisiana Board related to this or any other
11 violations.

12 **FOURTH CAUSE FOR DISCIPLINARY ACTION**
13 **Bus. & Prof. Code, §2761(a)**
 General Unprofessional Conduct

14 20. Complainant realleges the allegations set forth in paragraphs 17-19 above and
15 incorporates them by reference as if fully set forth.

16 21. The conduct as alleged in paragraphs 17-19 above constitutes general unprofessional
17 conduct and provides grounds for discipline of respondent's California registered nurse license
18 under the non-inclusive provisions of section 2761, subdivision (a).

19 **FIFTH CAUSE FOR DISCIPLINARY ACTION**
20 **Bus. & Prof. Code, § 2761, subd. (a)(4)**
 Unprofessional Conduct – Out of State Discipline

21 22. The allegations of paragraphs of 13-14 above are realleged and incorporated by
22 reference as if fully set forth.

23 23. Respondent has subjected her California registered nurse license to disciplinary action
24 under section 2761, subdivision (a)(4), in that on or about December 28, 2009, in a disciplinary
25 action before the Texas Board, the Texas Board issued an Agreed Order which conditionally
26 granted respondent a registered nurse license in Texas.

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1 24. The Agreed Order found that respondent completed an on-line application for
2 licensure as a registered nurse in Texas. She answered "no" to the question which asked if
3 respondent had been arrested for or convicted of a crime.

4 25. The Agreed Order placed conditions on respondent's conditionally granted Texas
5 license, including, but not limited to, payment of a \$250.00 fine, no working outside of Texas
6 without the permission of Texas and the other out-of-state Board, and completion within one year
7 of a course in Texas nursing jurisprudence and ethics.

8 **SIXTH CAUSE FOR DISCIPLINARY ACTION**
9 **Bus. & Prof. Code, §2761(a)**
 General Unprofessional Conduct

10 20. Complainant realleges the allegations set forth in paragraphs 22-25 above and
11 incorporates them by reference as if fully set forth.

12 21. The conduct as alleged in paragraphs 22-25 above constitutes general unprofessional
13 conduct and provides grounds for discipline of respondent's California registered nurse license
14 under the non-inclusive provisions of section 2761, subdivision (a).

15 **PRAYER**

16 WHEREFORE, complainant requests that a hearing be held on the matters alleged in this
17 Accusation, and that following the hearing the California Board of Registered Nursing issues a
18 decision:

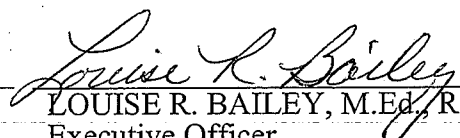
19 1. Revoking or suspending California Registered Nurse License Number 753903, issued
20 to Megan Ann Sandifer Harrison, a.k.a. Megan Ann Harrison-Vanbeest, a.k.a. Megan Ann
21 Sandifer Harrison-Vanbeest;

22 2. Ordering Megan Ann Sandifer Harrison, a.k.a. Megan Ann Harrison-Vanbeest, a.k.a.
23 Megan Ann Sandifer Harrison-Vanbeest, to pay the California Board of Registered Nursing the
24 reasonable costs of the investigation and enforcement of this case pursuant to Business and
25 Professions Code section 125.3; and

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1 3. Taking such other and further action as deemed necessary and proper.

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3 DATED: April 4, 2013


LOUISE R. BAILEY, M.Ed., R.N.
Executive Officer
Board of Registered Nursing
Department of Consumer Affairs
State of California
Complainant

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